

7/24/00

GJP

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UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT
OF PENNSYLVANIA

CRISTOPHER FERREIRAS and
ANATASHA FIGUEROA h/w and ANALYN
FERREIRAS, a minor by her parents and
natural guardians, CHRISTOPHER
FERREIRAS and ANATASHA FIGUEROA,

Plaintiffs,

v.

WILFREDO CANALES, CANALES & SONS
TRUCKING, INC. and JOSE SANTOS
CANALES,

Defendants.

CIVIL DIVISION

No.

19 2006

FILED

MAY 7 2019

KATE L. GORMAN, Clerk
By Dep. Clerk

NOTICE OF REMOVAL

AND NOW, come the Defendants, Wilfredo Canales, Canales & Sons Trucking, Inc. and Jose Santos Canales, by and through their counsel, PION, NERONE, GIRMAN, WINSLOW & SMITH, P.C. and John T. Pion, Esquire, James DeCinti, Esquire and Thomas A. Wimmer, Esquire, and pursuant to 28 U.S. C. §1441 and §1446, files this Notice of Removal of the foregoing matter from the Court of Common Pleas of Berks County, No. 19-5096 to the United States District Court for the Eastern District of Pennsylvania, and in support thereof, states as follows:

1. Plaintiffs commenced this civil action by filing a Civil Action Complaint in the Court of Common Pleas of Berks County, Pennsylvania at Civil Docket Number 19-5096 on April 29, 2019.
2. Plaintiffs are citizens of the Commonwealth of Pennsylvania.
3. Defendant, Wilfredo Canales, is a citizen of the State of Tennessee.

4. Defendant, Canales & Sons Trucking, Inc., is incorporated under the laws of the State of Tennessee and has its principle place of business in the State of Tennessee.

5. Defendant, Jose Santos Canalas, is a citizen of the State of Tennessee.

6. On April 29, 2019, Plaintiffs filed a Civil Action Complaint in the Berks County Court of Common Pleas which was served by mail on or about May 3, 2019.

7. Plaintiffs are citizens of the Commonwealth of Pennsylvania, Plaintiffs and Defendants are diverse, and diversity of citizenship existed at the time this civil action was filed and at the time of the filing of this Notice of Removal.

8. Plaintiffs' Complaint asserts counts for negligence and carelessness and claims damages for personal injuries including permanent injuries, consisting of acute strain and sprain with radiculopathy of the cervical and lumbar spine of Plaintiff, Cristopher Ferreiras, as well as economic claims for medical expenses that may be required for an indefinite period of time into the future, loss of earnings, loss of business opportunities and/or impairment of earning capacity or power, the amounts of [which are asserted to exceed the jurisdictional limits of compulsory arbitration (\$50,000.00) in Berks County].

9. In addition, Plaintiff, Analyn Ferreiras, a minor, by and through her parents and natural guardians, Cristopher Ferreiras and Anatasha Figureroa, claims serious permanent injuries including cerebral concussion, post-concussion syndrome, cervicgia, headaches, blurred vision, photophobia, dizziness, tinnitus and acute strain and sprain of the cervical spine [which are asserted to exceed the jurisdictional limits of compulsory arbitration (\$50,000.00) in Berks County].

10. A fair reading of the Plaintiffs' Complaint, with its inclusion of claims for serious and permanent injuries, future earnings loss and past and future medical expenses, reveals an

amount in controversy exceeding the sum of \$75,000.00, exclusive of interest and costs. See paragraphs 11-18 and paragraph 20 of Plaintiffs' Complaint found in Exhibit "A".

11. Accordingly, this action is one in which the District Courts of the United States possess original jurisdiction under 28 U.S. C. §1332.

12. Venue is proper in this Court because it is the district court for the district in which Plaintiffs' cause of action was original filed.

13. This Notice of Removal is filed within thirty (30) days after Defendants' receipt of service of Plaintiffs' Complaint at which time it was first ascertained that Plaintiffs' claim is one which is removable, in that complete diversity exists and Plaintiff claims compensatory damages for personal injury, loss of earnings and loss of earnings potential, as well as claims for past and future medical expenses.

14. Attached hereto as Exhibit "A", are true and correct copies of all of the pleadings which have been filed in this action in the Court of Common Pleas in Berks County, Pennsylvania at Docket No. 19-5096.

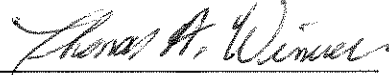
15. Concurrent with filing of this Notice of Removal, Defendants have filed a Notice of Filing of Notice of Removal with the Prothonotary of the Court of Common Pleas of Berks County, Pennsylvania, advising that Defendants have removed this action to the United States District Court for the Eastern District of Pennsylvania, together with service to all parties.

16. By filing this Notice of Removal, Defendants do not waive any defenses which may be available to it.

WHEREFORE, the civil action filed in the Court of Common Pleas of Berks County, Pennsylvania at Civil Docket No. 19-5096 is hereby removed to the United States District Court for the Eastern District of Pennsylvania.

Respectfully submitted,

**PION, NERONE, GIRMAN,
WINSLOW & SMITH, P.C.**

By: 

John T. Pion, Esquire

PA I.D. #43675

James DeCinti, Esquire

PA I.D. #77421

Thomas A. Wimmer, Esquire

PA I.D. #45294

Payne Shoemaker Building, 10th Floor

240 North Third Street

Harrisburg, PA 17101

#717-745-8768

Counsel for Defendants

Plaintiffs' Counsel:

Donald A. Krain, Esquire

Feldman Shepherd Wohlgeleirnter Tanner Weinstock & Dodig, LLP

1845 Walnut Street, 21st Floor

Philadelphia, PA 19103

dkrain1007@aol.com


CERTIFICATE OF SERVICE

I, Thomas A. Wimmer, Esquire, of the law firm of Pion, Nerone, Girman, Winslow & Smith, P.C., counsel for the Defendants, Wilfredo Canales, Canales & Sons Trucking, Inc. and Jose Santos Canales, hereby state that a true and correct copy of the foregoing **Notice of Removal** was filed with the Clerk of Court via U.S. Mail and a true and correct copy was served upon counsel of record by electronic mail on this date on this date as follows:

Donald A. Krain, Esquire
Feldman Shepherd Wohlgeleinter Tanner Weinstock & Dodig, LLP
1845 Walnut Street, 21st Floor
Philadelphia, PA 19103
dkrain1007@aol.com
(Counsel for Plaintiffs)

**PION, NERONE, GIRMAN,
WINSLOW & SMITH, P.C.**

Date: May 7, 2019

By: 

John T. Pion, Esquire
PA I.D. #43675
James DeCinti, Esquire
PA I.D. #77421
Thomas A. Wimmer, Esquire
PA I.D. #45294

Supreme Court of Pennsylvania

Court of Common Pleas
Civil Cover Sheet

Berks

County

For Prothonotary Use Only:

Docket No:

19 5096

The information collected on this form is used solely for court administration purposes. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or rules of court.

SECTION A

Commencement of Action:

- ☒ Complaint ☐ Writ of Summons ☐ Petition
☐ Transfer from Another Jurisdiction ☐ Declaration of Taking

Lead Plaintiff's Name:

Cristopher Ferreiras, et al.

Lead Defendant's Name:

Wilfredo Canales, et al.

Are money damages requested? ☒ Yes ☐ NoDollar Amount Requested: ☐ within arbitration limits
(check one) ☒ outside arbitration limitsIs this a *Class Action Suit*? ☐ Yes ☒ NoIs this an *MDJ Appeal*? ☐ Yes ☒ No

Name of Plaintiff/Appellant's Attorney: _____

☐ Check here if you have no attorney (are a Self-Represented [Pro Se] Litigant)

SECTION B

Nature of the Case:

Place an "X" to the left of the ONE case category that most accurately describes your **PRIMARY CASE**. If you are making more than one type of claim, check the one that you consider most important.

TORT (do not include Mass Tort)

- ☐ Intentional
☐ Malicious Prosecution
☒ Motor Vehicle
☐ Nuisance
☐ Premises Liability
☐ Product Liability (does not include mass tort)
☐ Slander/Libel/ Defamation
☐ Other: _____

MASS TORT

- ☐ Asbestos
☐ Tobacco
☐ Toxic Tort - DES
☐ Toxic Tort - Implant
☐ Toxic Waste
☐ Other: _____

PROFESSIONAL LIABILITY

- ☐ Dental
☐ Legal
☐ Medical
☐ Other Professional: _____

CONTRACT (do not include Judgments)

- ☐ Buyer Plaintiff
☐ Debt Collection: Credit Card
☐ Debt Collection: Other _____

- ☐ Employment Dispute: Discrimination
☐ Employment Dispute: Other _____

☐ Other: _____

REAL PROPERTY

- ☐ Ejectment
☐ Eminent Domain/Condemnation
☐ Ground Rent
☐ Landlord/Tenant Dispute
☐ Mortgage Foreclosure: Residential
☐ Mortgage Foreclosure: Commercial
☐ Partition
☐ Quiet Title
☐ Other: _____

CIVIL APPEALS

- Administrative Agencies
☐ Board of Assessment
☐ Board of Elections
☐ Dept. of Transportation
☐ Statutory Appeal: Other _____

☐ Zoning Board☐ Other: _____

MISCELLANEOUS

- ☐ Common Law/Statutory Arbitration
☐ Declaratory Judgment
☐ Mandamus
☐ Non-Domestic Relations
☐ Restraining Order
☐ Quo Warranto
☐ Replevin
☐ Other: _____

DEFENDANT'S
EXHIBIT

tabbles

Updated 1/1/2011

Cristopher Ferreiras, et al.

v.

Wilfredo Canales, et al.

Berks County

Term

No.

**NOTICE TO DEFEND
NOTIFICACIÓN PARA DEFENDERSE**

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

**Lawyers' Referral Service of the
Berks County Bar Association
544 Court Street
Reading, Pennsylvania 19601
Telephone (610)375-4591
www.BerksBar.org**

AVISO

Le han demandado a usted en el tribunal. Si usted quiere defenderse de las demandas expuestas en las páginas siguientes, usted debe tomar acción en el plazo de veinte (20) días a partir de la fecha en que se le hizo entrega de la demanda y la notificación, al interponer una comparecencia escrita, en persona o por un abogado y registrando por escrito en el tribunal sus defensas o sus objeciones a las demandas en contra de su persona. Se le advierte que si usted no lo hace, el caso puede proceder sin usted y podría dictarse un fallo por el juez en contra suya sin notificación adicional y podría ser por cualquier dinero reclamado en la demanda o por cualquier otro reclamo o agravio en la demanda solicitado por el demandante. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

USTED DEBE LLEVARLE ESTE DOCUMENTO A SU ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O NO PUEDE CORRER CON LOS GASTOS DE UNO, VAYA O LLAME POR TELEFONO A LA OFICINA EXPUESTA ABAJO. ESTA OFICINA PUEDE PROVEERLE INFORMACION RESPECTO A COMO CONTRATAR A UN ABOGADO.

SI NO PUEDE CORRER CON LOS GASTOS PARA CONTRATAR A UN ABOGADO, ESTA OFICINA PUDIERA PROVEERLE INFORMACION RESPECTO A INSTITUCIONES QUE PUEDAN OFRECER SERVICIOS LEGALES A PERSONAS QUE CALIFICAN PARA LA REDUCCION DE HONORARIOS O QUE NO TENGAN QUE PAGAR HONORARIOS.

**Servicio de Recomendación para Contratar Abogados
del Colegio de Abogados del Condado Berks
544 Court Street
Reading, Pennsylvania 19601
Teléfono (610) 375-4591
www.BerksBar.org**

FELDMAN SHEPHERD WOHLGELERNTER TANNER WEINSTOCK & DODIG, LLP

By: Donald A. Krain

Identification No.: 36462

Attorneys for Plaintiffs

21st Floor

1845 Walnut Street

Philadelphia, PA 19103

(215) 567-8300

Cristopher Ferreiras and Anatasha Figueroa
h/w

And

Analyn Ferreiras, a minor by her parents and
natural guardians, Christopher Ferreiras and
Anatasha Figueroa

104 N. Church Street

Robesonia, PA 19551

Plaintiff

v.

Wilfredo Canales

107 Kelsie Circle

Lebanon, TN 37087

And

Canales & Sons Trucking, Inc.

105 W. Market St.

Lebanon, TN 37087

And

Jose Santos Canales

451 Kinsey Blvd.

Madison, TN 37115

Defendant

COURT OF COMMON PLEAS
Berks COUNTY

TERM,

No.

Jury Trial Demanded

COMPLAINT

1. At all times material hereto plaintiffs Cristopher Ferreiras and Anatasha Figueroa are individuals who reside at the above address.
2. At all times material hereto plaintiff Analyn Ferreiras, a minor resides at the above address with her parents and natural guardians Cristopher Ferreiras and Anatasha Figueroa.
3. At all times material hereto defendant, Wilfredo Canales is an adult individual who resides at the above address. Mr. Canales was an employee of Canales & Sons Trucking, Inc and/or an employee and actual or apparent agent of the Defendants, Canales & Sons Trucking, Inc, and Jose Canales and was acting in the course and scope of his employment and agency with the Defendants, Canales & Sons Trucking, Inc, and Jose Canales.
4. At all times material hereto defendant, Canales & Sons Trucking Inc, is a business entity and/or corporation with a place of business located at 105 W. Market Street, Lebanon, TN 37087 which owned the vehicle that was being operated by Defendant Wilfredo Canales more specifically, a 1998 Freightliner tractor trailer.
5. At all times material hereto defendant, Jose Santos Canales is an adult individual who resides at the above address and was the owner of the trailer being hauled by Defendant Canales.
6. At all relevant times, Defendants Canales & Sons Trucking, Inc. and Jose Santos Canales regularly conducted business in the Commonwealth of Pennsylvania and Berks County, PA.
7. On May 19, 2017 at approximately 5:30 p.m., Plaintiff, Cristopher Ferreiras was the operator of a 2010 Mercedes Benz. Plaintiff, Analyn Ferreiras was a

passenger in the vehicle being operated by Cristopher Ferreiras. All parties were traveling eastbound on interstate 78 approaching mile marker 38.1 in Greenwich Township, Berks County, PA, when the vehicle in which plaintiffs Cristopher Ferreiras and Analyn Ferreiras were seated was struck from behind by a vehicle being operated by Defendant Wilfredo Canales and owned by Defendant's Canales & Sons Trucking, Inc and/or Jose Santso Canales. Said vehicle then caromed into several other vehicles before bursting into flames. As a result of the crash Plaintiffs sustained serious and permanent personal injuries more specifically set forth below.

8. At the time of the accident, Defendant, Wilfredo Canales, was employed by the Defendants, Canales & Sons Trucking, Inc. and Jose Santos Canales. Upon information and belief, Defendant, Wilfredo Canales, was acting in the course and scope of his employment at the time of the accident.
9. The accident as aforesaid was caused by the negligence of the Defendants and was in no manner whatsoever due to any act or failure to act on the part of the Plaintiffs.
10. The negligence of the defendants consisted of the following:
 - a. Operating the said motor vehicle at a high and excessive rate of speed under the circumstances;
 - b. Failure to keep a proper lookout ahead;
 - c. Failure to have said motor vehicle under such control as to be able to stop within the assured clear distance ahead;
 - d. Failure to make proper observations of traffic upon the roadway;
 - e. Failure to properly use the brakes;

- f. Being otherwise negligent under the circumstances;
- g. Operating a motor vehicle in careless disregard for the safety of persons or property in violation of 75 Pa.C.S.A. §3714;
- h. Careless and reckless driving;
- i. Failure to slow and stop for slowing traffic ahead;
- j. Failure to comply with the motor vehicle and commercial motor vehicle code, law, and regulations of the Commonwealth of Pennsylvania;
- k. Failure to comply with Federal code, law, and regulations, including the Motor Carrier Safety Administration regulations;
- l. Failure to comply with industry standards;
- m. Failure to properly hire, train, retain, supervise and monitor Defendant's driver, Wilfredo Canales;
- n. Failure to create, implement, and enforce appropriate policies and procedures concerning the inspection, maintenance, and operation of a commercial motor vehicle;
- o. Failure to comply with company policies and procedures concerning the inspection, maintenance and operation of a commercial motor vehicle; and
- p. Failure to properly inspect and maintain the commercial motor vehicle.

COUNT I

CRISTOPHER FERREIRAS V. ALL DEFENDANTS

11. As a result thereof, plaintiff, Cristopher Ferreiras, sustained serious injuries including but not limited to an acute strain and sprain with radiculopathy of the cervical and lumbar spine as well as injury to his nerves, ligaments, tendons and discs with multiple disc herniations of his cervical spine and lumbar spine with as well as aggravation of previously asymptomatic degenerative disc disease.

12. As a result of the aforesaid, plaintiff has endured much pain and suffering, which will continue in the future. He has incurred considerable medical expense for the treatment of his said injuries, which will continue in the future. He has been unable to perform his employment duties and, as a result thereof, his earning capacity has been impaired.
13. As a result thereof, plaintiff has been or will be obliged to receive and undergo medical attention and care and to expend various sums of money and to incur various expenses for the injuries he has suffered, the cost or reasonable value of which is in excess of benefits which he is entitled to receive, and he will be obliged to continue to expend such sums or incur such expenditures for an indefinite time in the future.
14. As a further result thereof, plaintiff has and will suffer a severe loss of earnings and/or impairment of earning capacity or earning power, which loss has or may be in excess of those benefits which he is entitled to receive, and he will continue to suffer such loss of earnings and/or impairment of earning capacity and earning power for an indefinite time in the future.
15. As a direct and reasonable result thereof, plaintiff has or may hereafter incur other financial expenses or losses which exceed or may in the future exceed amounts which he may otherwise be entitled to recover.
16. As a result of the aforesaid accident, plaintiff has been prevented from attending to his usual and daily activities and duties, and will continue to be prevented from attending to these activities and duties for an indefinite time in the future, to his great detriment and loss.

17. Furthermore, his injuries are serious and permanent resulting in a serious loss of a bodily function as defined by the Pennsylvania Motor Vehicle Responsibility Law.

18. Plaintiff is covered under an automobile insurance policy which provides for full tort coverage as defined by 75 P.S. Sec. 1705.

WHEREFORE, Plaintiff, Cristopher Ferreiras, demands judgment against the Defendants, individually and jointly and severally for damages, in an amount in excess of \$50,000.00, plus interest and costs.

COUNT II

ANALYN FERREIRAS, A MINOR v. ALL DEFENDANTS

19. Plaintiff incorporates herein paragraphs 1 through 18 in their entirety.

20. As a result thereof, plaintiff, Analyn Ferreiras, sustained serious injuries including but not limited to cerebral concussion, post-concussion syndrome, cervicalgia, headaches, blurred vision, photophobia, dizziness, tinnitus, blurred vision and acute strain and sprain of the cervical spine.

WHEREFORE, Plaintiff, Analyn Ferreiras, demands judgment against the Defendants, individually and jointly and severally for damages, in an amount in excess of \$50,000.00, plus interest and costs.


COUNT III - CONSORTIUM CLAIM

ANATASHA FIGUEROA v. ALL DEFENDANTS

21. Plaintiff incorporates paragraphs 1 through 20 as though same were fully set forth at length herein.
22. As a further result of the foregoing, the plaintiff has been deprived of her husband's assistance, society and companionship and will continue to be deprived for an indefinite time in the future.

WHEREFORE, plaintiff demands judgment against the defendant in an amount in excess of Fifty Thousand (\$50,000.00) Dollars.

FELDMAN SHEPHERD WOHLGELERNTER
TANNER WEINSTOCK & DODIG, LLP



DONALD A. KRAIN
ATTORNEY FOR PLAINTIFF

Date: 4-22-19

VERIFICATION

Cristopher
I, ~~C~~HRISTOPHER FERREIRAS, hereby verify that I am the plaintiff herein and that the facts set forth in the foregoing are true and correct to the best of my knowledge, information and belief.

I understand that false statements made by me are subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

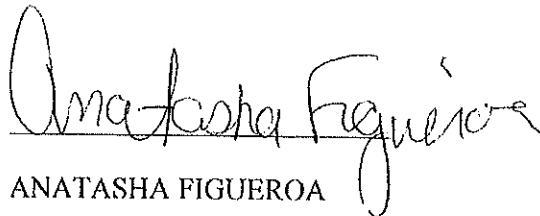

Cristopher
~~C~~HRISTOPHER FERREIRAS

DATED:

VERIFICATION

I, ANATASHA FIGUEROA, hereby verify that I am the plaintiff herein and that the facts set forth in the foregoing are true and correct to the best of my knowledge, information and belief.

I understand that false statements made by me are subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

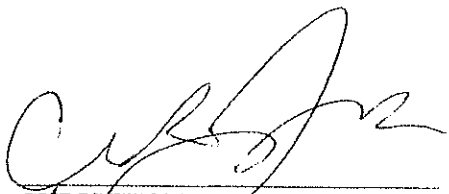

ANATASHA FIGUEROA

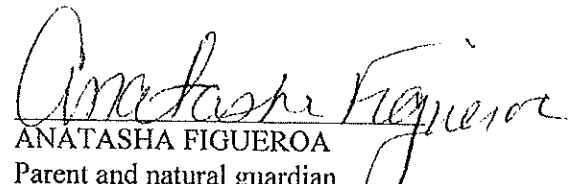
DATED:

VERIFICATION

ANALYN FERREIRAS a minor, by her parents and natural guardians, Christopher Ferreiras and Anatasha Figueroa, hereby verify that I am the plaintiff herein and that the facts set forth in the foregoing are true and correct to the best of my knowledge, information and belief.

I understand that false statements made by me are subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.


CHRISTOPHER FERREIRAS
Parent and natural guardian


ANATASHA FIGUEROA
Parent and natural guardian

DATED:

IN THE COURT OF COMMON PLEAS OF BERKS COUNTY, PENNSYLVANIA

CRISTOPHER FERREIRAS and
ANATASHA FIGUEROA h/w and ANALYN
FERREIRAS, a minor by her parents and
natural guardians, CHRISTOPHER
FERREIRAS and ANATASHA FIGUEROA,

Plaintiffs,

v.

WILFREDO CANALES, CANALES & SONS
TRUCKING, INC. and JOSE SANTOS
CANALES,

Defendants.

CIVIL DIVISION

No. 2010-916-CD

Issue No.

**PRAECIPE FOR ENTRY
OF APPEARANCE**

Code:

Filed on behalf of Defendants

Counsel of record for these parties:

John T. Pion, Esquire

PA I.D. #43675

James DeCinti, Esquire

PA I.D. #77421

Thomas A. Wimmer, Esquire

PA I.D. #45294

PION, NERONE, GIRMAN,

WINSLOW & SMITH, P.C.

Payne Shoemaker Building, 10th Floor

240 North Third Street

Harrisburg, PA 17101

717-737-5833

JURY TRIAL DEMANDED

IN THE COURT OF COMMON PLEAS OF BERKS COUNTY, PENNSYLVANIA

CRISTOPHER FERREIRAS and)	CIVIL DIVISION
ANATASHA FIGUEROA h/w and ANALYN)	
FERREIRAS, a minor by her parents and)	No. 19-5096
natural guardians, CHRISTOPHER)	
FERREIRAS and ANATASHA FIGUEROA,)	
)	
Plaintiffs,)	
)	
v.)	
)	
WILFREDO CANALES, CANALES & SONS)	
TRUCKING, INC. and JOSE SANTOS)	
CANALES,)	
)	
Defendants.)	

PRAECIPE FOR ENTRY OF APPEARANCE

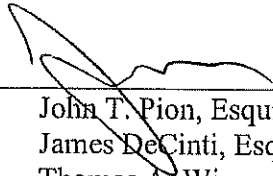
TO THE PROTHONOTARY:

Kindly enter our appearance on behalf of the Defendants, WILFREDO CANALES, CANALES & SONS TRUCKING, INC. and JOSE SANTOS CANALES, regarding the above-referenced matter.

A JURY TRIAL IS DEMANDED.

PION, NERONE, GIRMAN,
WINSLOW & SMITH, P.C.

By


John T. Pion, Esquire

James DeCinti, Esquire

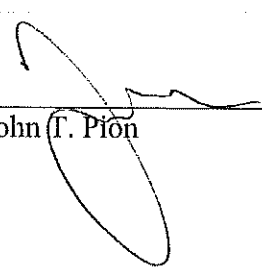
Thomas A. Wimmer, Esquire

Payne Shoemaker Building, 10th Floor
240 North Third Street
Harrisburg, PA 17101
717-737-5833

Counsel for Defendants

ATTORNEY CERTIFICATION

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.



John T. Pion

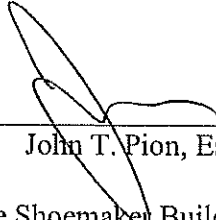
DATED: 5/6/19

CERTIFICATE OF SERVICE

I, John T. Pion, Esquire, hereby certify that a true and correct copy of the foregoing
Praecipe for Entry of Appearance was served upon counsel of record via e-mail this 6th day
of May, 2019, as follows:

Donald A. Krain, Esquire
Feldman Shepherd Wohlgelernter Tanner Weinstock & Dodig, LLP
21st Floor
1845 Walnut Street
Philadelphia, PA 19103
dkrain1007@aol.com
(Counsel for Plaintiffs)

PION, NERONE, GIRMAN,
WINSLOW & SMITH, P.C.

By  _____
John T. Pion, Esquire

Payne Shoemaker Building, 10th Floor
240 North Third Street
Harrisburg, PA 17101
717-737-5833

Counsel for Defendants